

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

INTELLECTUAL VENTURES I LLC and  
INTELLECTUAL VENTURES II LLC,

CIVIL ACTION NO. 2:13-cv-00740-AJS

District Judge Arthur J. Schwab

Plaintiffs,

v.

*Electronically filed*

PNC FINANCIAL SERVICES GROUP, INC.  
and PNC BANK NA,

Defendants.

**PLAINTIFFS INTELLECTUAL VENTURES I LLC AND INTELLECTUAL  
VENTURES II LLC MOTION FOR LEAVE TO FILE UNDER SEAL**

Plaintiffs, Intellectual Ventures I LLC and Intellectual Ventures II LLC, through undersigned counsel, submit this Motion for Leave to File Under Seal, and in support of this Motion, offer the following:

1. Pursuant to Paragraph 14 of the Protective Order, if a party wishes to submit to the Court documents comprising or referencing confidential materials, it must file a motion with the Court seeking leave to file the confidential material under seal.
2. Plaintiffs intend to file a Motion for Leave to File an Amended Complaint. As Exhibit A to their motion, Plaintiffs plan to append their proposed Amended Complaint to add PNC Merchant Services as a Defendant to this matter. The Motion for Leave to File an Amended Complaint references confidential documents that were provided to Plaintiffs by Defendant which indicate that PNC Merchant Services is a proper party to this litigation.
3. Plaintiffs respectfully request that this Court permit them to file under seal this confidential Motion for Leave to File an Amended Complaint, to ensure its availability to the Court but protection from public view.

WHEREFORE, Plaintiffs, Intellectual Ventures I LLC and Intellectual Ventures II LLC, respectfully request that this Honorable Court grant this Motion for Leave to File Under Seal.

Dated: September 26, 2013

Respectfully submitted,

ZIMMER KUNZ, PLC

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Samantha A. Quinn

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**CERTIFICATE OF SERVICE**

A copy of the foregoing was electronically filed with the Court this 26th day of September, 2013. Notice of this filing will be sent by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Samantha A. Quinn

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**ORDER OF COURT**

AND NOW, this \_\_\_\_\_ day of September, 2013, upon consideration of Plaintiffs' Motion for Leave to File Under Seal, it is hereby ORDERED, ADJUDGED and DECREED that Plaintiffs' Motion is GRANTED and Plaintiffs may file under seal their Motion for Leave to File an Amended Complaint. The Motion for Leave to File an Amended Complaint shall remain under seal until further Order of this Court.

BY THE COURT:

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Honorable Arthur J. Schwab J.